

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:20-cv-1072-LCB-LPA

MARTHA HOELZER and all similarly  
situated individuals,

Plaintiff,

V

DANIEL LEBOLD,

Defendant.

**AFFIDAVIT  
OF  
VALERIE L. BATEMAN**

COMES NOW the undersigned and shows the Court the following:

1. I am licensed in the State of North Carolina and have been since 1986. I am also licensed in the State of Virginia since 2021. I have 36 years of civil litigation experience and practicing law.
2. I practiced employment law defending the State while working for the N.C. Department of Justice from 1986 to 2015.
3. From 1997 to 2015, I served as the in-house counsel for the N.C. Office of State Personnel (OSP) while working for the N.C. Department of Justice.
4. In 2013, I became the first in-house general counsel for OSP which became known as the Office of State Human Resources (OSHR) and served in that position until April of 2015, when I moved to the office of the General Counsel for the N.C. Department of Public Safety.

5. During my time working as the General Counsel for the OSP/OSHR, I worked with the Agency and the State Personnel Commission in enforcing the statutes contained in Chapter 126 of the North Carolina General Statutes and the rules promulgated thereunder in Title 26 of the North Carolina Administrative Code. My work included drafting changes to many statutes in Chapter 126 and rules in Title 26.
6. Prior to my work with OSP/OSHR, I represented the State of North Carolina and the N.C. Department of Correction in a Title VII class action lawsuit, No. 5:93-CV-763-BO1, brought by the EEOC on behalf of female correctional officers.
7. While working in the N.C. Department of Justice and after I became general counsel for OSP/OSHR, I was assigned to and then assisted with the defense of the State and the State Personnel Commission of a class action lawsuit in State court brought by temporary employees between 2005 and and 2015.
8. My law partner June K. Allison has been licensed since 1981 by the North Carolina State Bar and is admitted to the bars of the United States Supreme Court, the Fourth Circuit, the United States districts courts in North Carolina, and has 41 years of experience in civil litigation and in practicing law.

9. My law partner Heather A. Benjamin has been licensed as a lawyer since 1992 and is admitted to the bars of North Carolina, New Jersey, and Pennsylvania, and has 30 years of experience practicing law.
10. Kathryn Jagoda, an associate lawyer practicing with us, has been licensed since 2013.
11. New South Law Firm has the necessary resources and expertise to represent the proposed class.
- Further the affiant sayeth not.
- This the 3<sup>rd</sup> day of May 2022.

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Valerie L. Bateman  
New South Law Firm

**VERIFICATION OF VALERIE L. BATEMAN**

Valerie L. Bateman, being duly sworn, deposes and says:

That the contents of the foregoing Affidavit about which she has knowledge are true to her own knowledge, except as to matters stated on information and belief, and as to those matters, she believes them to be true.

\_\_\_\_\_  
VALERIE L. BATEMAN

Orange County

Subscribed and sworn to before me this day

by Valerie L. Bateman

on the \_\_\_\_ day of \_\_\_\_\_ 2022.

\_\_\_\_\_  
NOTARY PUBLIC

\_\_\_\_\_  
Printed name of Notary

My Commission Expires: